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November 15, 2023

VIA ECF

Honorable Lewis J. Liman
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007
LimanNYSDChambers@nysd.uscourts.gov

Re: *Aaron Abadi v. American Airlines Group, Inc. et al.*
1:23-cv-04033-LJL

Dear Judge Liman:

We represent defendant Qatar Airways Group Q.C.S.C. (“Qatar Airways”) (incorrectly sued as “Qatar Airways Q.C.S.C. d/b/a Qatar Airways Q.C.S.C. Corporation”) in the above-referenced action.

Qatar Airways writes to advise the Court that it is wholly owned by the Government of the State of Qatar and, therefore, is an agency or instrumentality of a “foreign state” as that term is defined under the Foreign Sovereign Immunities Act of 1976 (“FSIA”), codified at 28 U.S.C. § 1603(a). *See, e.g., Sirmans v. Qatar Airways Q.C.S.C.*, 2022 WL 3135349 (S.D.N.Y. July 26, 2022) (notice of removal invoking FSIA). Under the FSIA, Qatar Airways is legally entitled to 60 days to respond to the Complaint. 28 U.S.C. § 1608(d). Plaintiff served Qatar Airways with process on October 27, 2023, making the response due on December 26, 2023.

Alternatively, to the extent the Court considers this a request for an extension of time, we write pursuant to Rule 1(D) of Your Honor’s Individual Practices in Civil Cases, and respectfully request that the deadline for Qatar Airways’ time to respond be December 26, 2023. We consulted with *pro se* Plaintiff Aaron Abadi, who did not object. This would be Qatar Airways’ first request for an extension. Qatar Airways reserves all of its rights and defenses, none of which are waived by this request.

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We thank the Court for its consideration.

Respectfully submitted,



Judith R. Nemsick